

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JANE DOE,

*Plaintiff,*

v.

DARREN K. INDYKE AND RICHARD D. KAHN,  
in their capacities AS EXECUTORS OF THE  
ESTATE OF JEFFREY E. EPSTEIN,

*Defendants.*

Case No. 1:20-civ-02365-LJL-DCF

**JOINT STIPULATION AND [PROPOSED] ORDER STAYING ACTION**

WHEREAS independent claims administration experts have designed and are implementing the Epstein Victims' Compensation Program (the "Program") to resolve sexual abuse claims against decedent Jeffrey E. Epstein ("Decedent") in a non-adversarial alternative to litigation; and

WHEREAS Plaintiff Jane Doe ("Plaintiff," and together with Defendants Darren K. Indyke and Richard D. Kahn, as Co-Executors of the Estate of Jeffrey E. Epstein, the "Parties") seeks to participate in the Program; and

WHEREAS the Parties seek to preserve their resources and judicial economy by staying this action unless and until Plaintiff elects to resume the litigation and requests the stay be lifted; and

WHEREAS should Plaintiff resolve her claims against Defendants via the Program, the Parties will thereafter promptly discontinue this action with prejudice.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the Parties, that:

1. The captioned action is hereby stayed pending further Order of the Court.

2. After the lifting of the stay, if any, the Parties will confer on a schedule to answer, move, or otherwise respond to Plaintiff's Complaint and any motion to proceed anonymously.

Dated: July 10, 2020  
New York, New York

Respectfully submitted,  
  
KAISER SAURBORN & MAIR, P.C.

By: /s/ **Daniel J. Kaiser**

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*Attorneys for Defendants*

Date: \_\_\_\_\_, 2020  
New York, New York

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HON. DEBRA C. FREEMAN  
United States Magistrate Judge